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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is the Joint Submission in Response to Dkt. 506 re 487, 505: Discovery Orders 1 & 2.

Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text to Be Sealed	Basis for Sealing Portion of Document
First Order on March 11, 2022 Joint Discovery Dispute Chart (Dkt. 487)	GRANTED as to the portions at: PDF pages 4-17, 31-33	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects, identifiers, internal practices with regard to Incognito and its proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Second Order on March 11, 2022 Joint Discovery Dispute Chart (Dkt. 505)	GRANTED as to the portions at: PDF pages 4-8, 10-20, 38-41, 48-49	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including details related to internal projects, identifiers, internal practices with regard to Incognito and its proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

SO ORDERED.

DATED: _____

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge